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Accident Injury Medical Center
and Sebastian P. Balle, M.D.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALLSTATE INSURANCE COMPANY,
ALLSTATE PROPERTY & CASUALTY
INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, and ALLSTATE
FIRE & CASUALTY INSURANCE
COMPANY,

Plaintiff,

vs.

PETER MARIO BALLE, D.C., SEBASTIAN P.
BALLE, M.D., ARTHUR ROSSI, D.C.,
RICHARD CHARETTE, ELITER ATL, LLC.,
ACCIDENT INJURY MEDICAL CENTER,
INC, ACCIDENT TRIAL LAWYERS, LLC.,
ACCIDENT TRIAL LAWYERS, INC., REAL
TIME MARKETING, INC., ANDREW
TAYLOR, RAMSEY AND ASSOCIATES,
INC., and DENNIS RAMSEY,

Defendants.

CIVIL CASE NO.: 2:10-CV-02205-KJD-GWF

**STIPULATION AND PROTECTIVE
ORDER REGARDING DEFENDANTS'
CONFIDENTIAL FINANCIAL
DOCUMENTS**

**STIPULATION AND PROTECTIVE ORDER REGARDING DEFENDANTS'
CONFIDENTIAL FINANCIAL DOCUMENTS**

The parties to the above-entitled action, by and through their attorneys or record herein,
hereby agree as follows:

1. That good cause exists for the parties to enter into a Protective Order concerning the
Defendants confidential financial documents, which may be provided by the Defendants to

1 the Plaintiffs through discovery efforts in this matter.

2 2. A protective Order is necessary because Defendants are of the good faith belief that these
3 financial documents are confidential (In accordance with FRCP 26 (c)(1)(a)), forbidding
4 Plaintiffs from disclosing discovery.

5 3. As such, the parties hereby stipulate that the following measures be implemented in
6 connection with any financial documents belonging to the Defendants, that might be
7 produced by the Defendants to the Plaintiffs pursuant to legitimate discovery requests in
8 this matter.

9
10 a. No party or his agent shall use any such documents for any purpose not related to the
11 present litigation. In this regard, the parties agree not to disclose these documents to
12 anyone other than their lawyers and their agents, experts, and the Court and/or the
13 jury as the Court deems proper, and strictly for purposes related to the present
14 litigation.

15
16 b. That whenever any such financial documents obtained from Plaintiffs are used in any
17 pleading or exhibit filed with the Court, the party filing such information will do so in
18 a pleading wherein such pleading has been requested to be filed under seal.

19 c. Upon the completion of this litigation, the parties agree that all such documents
20 obtained from the Defendants will be returned to the Defendants.

21 d. Each page of the documents that are subject to this Protective Order are to be labeled
22 as being "Subject to Federal Court Protective Order, Case No. 2:10-CV-02205-APG-
23 NJK."

24 e. All Photocopies, transcripts, or other reproduction of the documents, or of any of the
25 contents of those documents, are also subject to this Protective Order.

26
27 4. That without written permission from Defendants or a Court order secured after
28 appropriate notice to all interested persons, a party may not file in the public record in

1 this action any protected material.

2 5. That the Parties further acknowledge that pursuant to Kamakana v. City and Chamber of
3 Honolulu, 447 F.3d 1172, 1180 (9th Cir. 2006), any Party seeking to seal attachments to a
4 motion for summary judgment or other dispositive motion shall be required to seek
5 further leave of Court.

6 6. That when seeking leave to file documents under seal seeking protective status of the
7 document(s), the Parties must establish "compelling reasons" to rebut the presumption of
8 the public access and submit a separate memorandum of points and authorities which
9 presents articulable facts identifying the interest favoring continuing the secrecy of the
10 attachments, and show that these specific interests outweigh the public's interests in
11 disclosure.

12 A disclosure by a party, or by that party's agent, of any document that is subject to this
13 Protective Order in a matter that is inconsistent with the provisions of this Protective Order will
14 subject that party to sanctions, which may include contempt, as this Court might deem proper.

15 DATED this day 11th of September, 2013.

16 By: 

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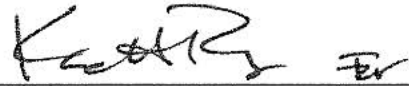
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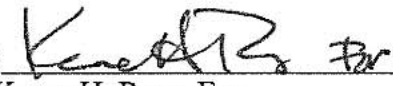
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Sebastian P. Balle, M.D. and
Accident Injury Medical Center

Dated: September 12, 2013

IT IS SO ORDERED


U.S. Magistrate Judge